

# **EXHIBIT 1**

**Redacted Version of  
Document Sought to be  
Sealed**

CONFIDENTIAL

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION  
CHASOM BROWN,  
Plaintiff, Case No.  
vs.  
4:20-cv-03664-YGR-SVK  
GOOGLE LLC,  
Defendant.  
\*\*\*\*\*  
CONFIDENTIAL  
VOLUME II  
CONTINUED ZOOM VIDEOTAPED DEPOSITION OF  
JONATHAN HOCHMAN  
July 21, 2022  
10:09 a.m.  
\*\*\*\*\*

TAKEN BY:  
JOSEF ANSORGE, ESQ.  
ATTORNEY FOR DEFENDANT  
  
REPORTED BY:  
BELLE VIVienne, RPR, CRR, NJ-CRR,  
WA/CO/NM-CCR  
NATIONALLY CERTIFIED REALTIME  
COURT REPORTER  
VERITEXT LEGAL SOLUTIONS  
JOB NO. 5312353  
866.299.5127

## CONFIDENTIAL

<p>1 APPEARANCES</p> <p>2 FOR THE PLAINTIFF:</p> <p>3 MARK MAO</p> <p>4 BOIES SCHILLER FLEXNER LLP</p> <p>5 44 Montgomery Street, 41st Floor</p> <p>6 San Francisco, California 94104</p> <p>7 415 293 6800</p> <p>8 mmao@bsflp.com</p> <p>9 RYAN MCGEE</p> <p>10 MORGAN &amp; MORGAN</p> <p>11 201 North Franklin Street</p> <p>12 7th Floor</p> <p>13 Tampa, Florida 33602</p> <p>14 813 223 0931</p> <p>15 rmcgee@forthepeople.com</p> <p>16 ALEXANDER FRAWLEY</p> <p>17 IAN CROSBY</p> <p>18 SUSMAN GODFREY</p> <p>19 1301 Avenue of the Americas</p> <p>20 32nd Floor</p> <p>21 New York, New York 10019</p> <p>22 Afrawley@susmangodfrey.com</p> <p>23 COUNSEL FOR PLAINTIFF IN CALHOUN MATTER:</p> <p>24 ADAM PROM</p> <p>25 DICELLO LEVITT &amp; GUTZLER</p> <p>10 North Dearborn Street, Sixth Floor</p> <p>Chicago, Illinois 60602</p> <p>312 214 7900</p> <p>aprom@dicellolevitt.com</p> <p>COUNSEL FOR DEFENDANT:</p> <p>JOSEF ANSORGE</p> <p>JOHN WILSON, IV</p> <p>QUINN EMANUEL URQUHART &amp; SULLIVAN LLP</p> <p>51 Madison Avenue</p> <p>New York, New York 10010</p> <p>josefansorge@quinnemanuel.com</p> <p>CARL SPILLY</p> <p>QUINN EMANUEL URQUHART &amp; SULLIVAN, LLP</p> <p>1300 I Street, NW, Suite 900</p> <p>Washington, D C 20005</p> <p>202 538 8277</p> <p>carlspilly@quinnemanuel.com</p> <p>Page 366</p>	<p>1 - - -</p> <p>2 I N D E X</p> <p>3 - - -</p> <p>4 Testimony of:</p> <p>5 JONATHAN HOCHMAN</p> <p>6 MR. ANSORGE..... 372</p> <p>7</p> <p>8 - - -</p> <p>9 E X H I B I T S</p> <p>10 - - -</p> <p>11 NO. DESCRIPTION PAGE</p> <p>12 Exhibit 17 Appendix F.....374</p> <p>13 Exhibit 18 Dr. Glen Bernston's</p> <p>14 deposition.....379</p> <p>15 Exhibit 19 Excerpt from Glen</p> <p>16 Berston's deposition.....384</p> <p>17 Exhibit 20 Two-page policy document...414</p> <p>18 Exhibit 21 Log Data Usage Rules.....439</p> <p>19 Exhibit 22 Article entitled Privacy</p> <p>20 Threats in Intimate</p> <p>21 Relationships.....496</p> <p>22 Exhibit 24 Understanding Dual</p> <p>23 Stacking of IPv4 and Piv6</p> <p>24 Unicast Addresses.....503</p> <p>25</p> <p>Page 368</p>
<p>1 APPEARANCES: (Continued)</p> <p>2 CRYSTAL NIX-HINES</p> <p>3 QUINN EMANUEL URQUHART &amp; SULLIVAN LLP</p> <p>4 865 South Figueroa Street, 10th Floor</p> <p>5 Los Angeles, California 90017</p> <p>6 crystalnixhines@quinnemanuel.com</p> <p>7 VIDEOGRAPHER:</p> <p>8 Sean Grant</p> <p>9 ALSO PRESENT:</p> <p>10 Konstantinos Psounis, Ph.D.</p> <p>11 Julie Burns</p> <p>12 John Wilson, IV - Quinn Emanuel</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Page 367</p>	<p>1 - - -</p> <p>2 E X H I B I T S (Continued.)</p> <p>3 - - -</p> <p>4 NO. DESCRIPTION PAGE</p> <p>5 Exhibit 25 Ad Personalization</p> <p>6 Settings.....512</p> <p>7 Exhibit 26 Expert Report of</p> <p>8 Konstantinos Psounis.....520</p> <p>9 Exhibit 29 Document Bates numbered</p> <p>10 GOOG-BRWN-00630517.....558</p> <p>11 Exhibit 30 Document Bates numbered</p> <p>12 GOOG-CABR03923580.....561</p> <p>13 Exhibit 31 Document Bates numbered</p> <p>14 GOOG-CABR-00894408.....567</p> <p>15 Exhibit 32 PII document.....568</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Page 369</p>

## CONFIDENTIAL

<p>1 Policy is nice. It's nice to 12:04:10</p> <p>2 have a policy to -- to say that you're 12:04:12</p> <p>3 doing the right thing. I don't know what 12:04:15</p> <p>4 exemptions exist. I don't know how 12:04:16</p> <p>5 closely this policy's been followed in 12:04:18</p> <p>6 practice, and the policy can't control for 12:04:22</p> <p>7 things like legal risk, data breaches. As 12:04:27</p> <p>8 I said before, there's -- there's a great 12:04:31</p> <p>9 danger in logging sensitive data. 12:04:34</p> <p>10 Q. Mr. Hochman, in reaching the 12:04:39</p> <p>11 conclusions that you have proffered in 12:04:41</p> <p>12 this case, did you investigate which 12:04:43</p> <p>13 internal Google policies have been in 12:04:47</p> <p>14 place over the course of the class period? 12:04:49</p> <p>15 A. I think I alluded to this in a 12:04:53</p> <p>16 prior answer, so I'll point to that and 12:04:55</p> <p>17 add, for security and privacy, as a 12:04:58</p> <p>18 computer scientist -- I'm not a 12:05:04</p> <p>19 sociologist. I'm not an expert on 12:05:08</p> <p>20 business management. I'm talking about 12:05:10</p> <p>21 data security and privacy. 12:05:12</p> <p>22 And from that standpoint, it's a 12:05:14</p> <p>23 question of what could be done with things 12:05:16</p> <p>24 the way they are stored and the way 12:05:18</p> <p>25 they're retained. Policy is all fine and 12:05:20</p> <p style="text-align: right;">Page 446</p>	<p>1 talking about the "Re-Identifying logs 12:06:52</p> <p>2 data" section. And let me know if -- when 12:06:55</p> <p>3 you're there. And in particular, the 12:06:58</p> <p>4 first bullet that I read out earlier in 12:07:00</p> <p>5 red that begins with "you must not 12:07:03</p> <p>6 re-identify." 12:07:06</p> <p>7 Do you see that? 12:07:06</p> <p>8 A. Yes, I do see that Google 12:07:09</p> <p>9 recognizes the danger of reidentification. 12:07:11</p> <p>10 Q. And my question to you, 12:07:14</p> <p>11 Mr. Hochman, is what is reidentify? 12:07:17</p> <p>12 A. Reidentify. So I'll give you a 12:07:24</p> <p>13 quick summary of it. If you have a record 12:07:26</p> <p>14 that looks like it's anonymous data, 12:07:28</p> <p>15 reidentifying means figuring out 12:07:31</p> <p>16 specifically who that data is associated 12:07:34</p> <p>17 with or what entity that data is 12:07:37</p> <p>18 associated with. 12:07:38</p> <p>19 Q. Would taking logged-out private 12:07:42</p> <p>20 browsing data at issue in this case and 12:07:46</p> <p>21 then using that to reidentify individuals 12:07:49</p> <p>22 who may have been associated with the 12:07:53</p> <p>23 browsing be reidentification in your 12:07:55</p> <p>24 opinion? 12:08:01</p> <p>25 MR. MAO: Objection to the form 12:08:02</p> <p style="text-align: right;">Page 448</p>
<p>1 good, but there have been a huge number of 12:05:24</p> <p>2 examples where policy isn't followed by 12:05:30</p> <p>3 either an internal actor or an external 12:05:32</p> <p>4 actor. There are an enormous number of 12:05:35</p> <p>5 data breaches. Very embarrassing to large 12:05:37</p> <p>6 companies and it's sort of only a matter 12:05:39</p> <p>7 of time until all this data gets stolen 12:05:41</p> <p>8 and exploited by someone hostile. 12:05:43</p> <p>9 Q. Well, Mr. Hochman, is it fair to 12:05:51</p> <p>10 say that what Google's internal policy is 12:05:54</p> <p>11 has no bearing on the conclusions that 12:05:56</p> <p>12 you've reached in this case? 12:06:00</p> <p>13 A. I am not, off the top of my 12:06:03</p> <p>14 head, thinking of an opinion I gave which 12:06:06</p> <p>15 talks about policy. I'm talking about 12:06:09</p> <p>16 what Google is doing versus what they've 12:06:15</p> <p>17 told people they're doing. And I've also, 12:06:18</p> <p>18 I think, highlighted some of the ways that 12:06:25</p> <p>19 the data can be joined together. 12:06:27</p> <p>20 And the fact that Google says 12:06:30</p> <p>21 "don't join the data together," that's all 12:06:32</p> <p>22 nice, but that's not -- that's not 12:06:35</p> <p>23 security. That's just policy. 12:06:40</p> <p>24 Q. Turn back to the page ending 12:06:47</p> <p>25 with the Bates designation 006. We were 12:06:49</p> <p style="text-align: right;">Page 447</p>	<p>1 of the question. 12:08:03</p> <p>2 Please, go ahead. 12:08:04</p> <p>3 A. Sure. If you take some 12:08:05</p> <p>4 logged-out browsing data and you figure 12:08:07</p> <p>5 out, for example, the GAIA ID of that 12:08:10</p> <p>6 person, or you -- you take the -- the IP 12:08:15</p> <p>7 address and user agent, which essentially 12:08:20</p> <p>8 is identifying, and you -- you track down 12:08:22</p> <p>9 the person, I think if you've identified 12:08:25</p> <p>10 someone based on an otherwise anonymous 12:08:32</p> <p>11 record, it's reidentification. 12:08:35</p> <p>12 Now, that raises sort of a 12:08:37</p> <p>13 philosophical question. If Google is 12:08:39</p> <p>14 logging this private browsing activity 12:08:41</p> <p>15 with the user agent and the IP address, 12:08:45</p> <p>16 then it's arguable that that's not really 12:08:51</p> <p>17 an anonymous record because it's already 12:08:53</p> <p>18 identified by that data. 12:08:56</p> <p>19 BY MR. ANSORGE:: 12:08:56</p> <p>20 Q. Let's turn to the second 12:09:02</p> <p>21 sentence, where it says "If a log does not 12:09:03</p> <p>22 include GAIA IDs or similar authenticated 12:09:05</p> <p>23 Personally Identifiable Information, you 12:09:10</p> <p>24 must not re-identify the log records in 12:09:14</p> <p>25 any way." 12:09:17</p> <p style="text-align: right;">Page 449</p>

## CONFIDENTIAL

<p>1 Did I read that out correctly? 12:09:17</p> <p>2 A. Just a second. So this is -- 12:09:20</p> <p>3 this is a very carefully crafted sentence 12:09:28</p> <p>4 here with some gymnastics in it because it 12:09:31</p> <p>5 talks about -- in limitations, it talks 12:09:34</p> <p>6 about a log that does not include GAIA 12:09:35</p> <p>7 IDs -- I'm sorry. I'm going too far. 12:09:39</p> <p>8 Yes, I think you read it 12:09:44</p> <p>9 correctly. 12:09:45</p> <p>10 Q. I believe yesterday you 12:09:45</p> <p>11 testified that the data at issue in this 12:09:46</p> <p>12 case is stored in B logs, but that it 12:09:48</p> <p>13 could be joined with P logs. 12:09:52</p> <p>14 Do you recall that? 12:09:54</p> <p>15 A. I think I said something to that 12:09:55</p> <p>16 effect. Whatever I said is -- is on the 12:09:57</p> <p>17 record, and that's my answer again. 12:10:00</p> <p>18 Q. So does a B log contain GAIA 12:10:07</p> <p>19 IDs? 12:10:11</p> <p>20 A. B log is a Biscotti log. I 12:10:14</p> <p>21 don't recall instances of B logs 12:10:19</p> <p>22 containing GAIA IDs, although I do know 12:10:22</p> <p>23 that GAIA logs, which are P logs, may 12:10:25</p> <p>24 contain sort of blinded Biscotti IDs or 12:10:30</p> <p>25 encrypted Biscotti IDs. 12:10:38</p> <p style="text-align: right;">Page 450</p>	<p>1 not fingerprint users for the purpose of 12:11:45</p> <p>2 associating a user's activity over time or 12:11:47</p> <p>3 across contexts ("tracking") or 12:11:51</p> <p>4 reidentifying them when you do not have 12:11:55</p> <p>5 access to actual identifiers such as 12:11:59</p> <p>6 cookies or GAIA IDs." 12:12:02</p> <p>7 Do you see that? 12:12:07</p> <p>8 A. I do see that. 12:12:07</p> <p>9 Q. And what's your understanding of 12:12:08</p> <p>10 cookies and GAIA IDs that are being 12:12:11</p> <p>11 referred to here? 12:12:16</p> <p>12 A. Cookies are cookies, and the 12:12:18</p> <p>13 GAIA ID is the logged-in user ID. And my 12:12:20</p> <p>14 understanding of the sentence is that 12:12:24</p> <p>15 fingerprinting would then be allowed if 12:12:26</p> <p>16 you have access to these actual 12:12:28</p> <p>17 identifiers. 12:12:30</p> <p>18 Q. So your understanding of this 12:12:32</p> <p>19 policy is that if a person has access to 12:12:34</p> <p>20 GAIA ID, then they're permitted to 12:12:41</p> <p>21 fingerprint them for reidentification? 12:12:44</p> <p>22 A. That's one scenario where it's 12:12:47</p> <p>23 permitted. Another scenario is when 12:12:48</p> <p>24 there -- they have access to actual 12:12:51</p> <p>25 identifiers such as cookies. And I don't 12:12:54</p> <p style="text-align: right;">Page 452</p>
<p>1 And I think we are going to have 12:10:41</p> <p>2 to be really careful when we review this 12:10:42</p> <p>3 transcript because "B" and "P" sound very 12:10:45</p> <p>4 similar. 12:10:47</p> <p>5 Q. Turn to the next bullet below 12:10:47</p> <p>6 where it states "You must not correlate 12:10:49</p> <p>7 authenticated and non-authenticated 12:10:51</p> <p>8 information." 12:10:52</p> <p>9 What's your understanding of 12:10:52</p> <p>10 nonauthenticated information, Mr. Hochman? 12:10:56</p> <p>11 A. My understanding of that is 12:10:58</p> <p>12 logged out. 12:11:00</p> <p>13 Q. So would the data at issue in 12:11:03</p> <p>14 this case in the private browsing data 12:11:07</p> <p>15 when users do not log in during the 12:11:11</p> <p>16 private browsing session be authenticated 12:11:13</p> <p>17 or unauthenticated information? 12:11:16</p> <p>18 MR. MAO: Objection, asked and 12:11:18</p> <p>19 answered. 12:11:19</p> <p>20 A. So if the user is not logged in, 12:11:24</p> <p>21 I -- I understand unauthenticated to mean 12:11:28</p> <p>22 not logged in at that moment. 12:11:35</p> <p>23 BY MR. ANSORGE:: 12:11:41</p> <p>24 Q. If you turn to the third bullet, 12:11:42</p> <p>25 please. You see where it says "You must 12:11:43</p> <p style="text-align: right;">Page 451</p>	<p>1 see any limitation placed on cookies in 12:12:57</p> <p>2 this sentence. 12:13:00</p> <p>3 So I'm aware that there are 12:13:01</p> <p>4 logged-out cookies like Biscotti and 12:13:03</p> <p>5 Zwieback. 12:13:06</p> <p>6 Q. I think we can put this exhibit 12:13:08</p> <p>7 to the side for now. Thank you, 12:13:16</p> <p>8 Mr. Hochman. 12:13:18</p> <p>9 A. Okay. 12:13:24</p> <p>10 Q. You can turn to Exhibit 1, which 12:13:25</p> <p>11 is your opening report at page 94, 12:13:28</p> <p>12 paragraph 226. And let me know once 12:13:33</p> <p>13 you're there. 12:13:35</p> <p>14 MR. MAO: Sorry, quick 12:13:40</p> <p>15 procedural question. Are we taking 12:13:41</p> <p>16 suggestion from your team that we put 12:13:44</p> <p>17 Exhibit 1 into this deposition? 12:13:46</p> <p>18 MR. ANSORGE: Can we go off the 12:13:51</p> <p>19 record to work it out? I believe the 12:13:52</p> <p>20 court reporter had an opinion on it 12:13:53</p> <p>21 too. 12:13:55</p> <p>22 MR. MAO: Oh, okay. 12:13:56</p> <p>23 THE VIDEOGRAPHER: Do you want 12:13:59</p> <p>24 to go off, Counsel? 12:13:59</p> <p>25 MR. MAO: Sure. 12:14:01</p> <p style="text-align: right;">Page 453</p>

## CONFIDENTIAL

<p>1 used to look in the -- the logs of -- 12:39:20</p> <p>2 containing logged-out activity and see if 12:39:25</p> <p>3 there were matching examples within some 12:39:28</p> <p>4 reasonable time frame. You know, I 12:39:31</p> <p>5 recognize that IP addresses sometimes get 12:39:34</p> <p>6 changed, but if you can find activity 12:39:36</p> <p>7 temporally close together, you can infer 12:39:40</p> <p>8 that that's the same person. So there 12:39:43</p> <p>9 would be a way for Google to verify that 12:39:45</p> <p>10 claim sometimes. 12:39:49</p> <p>11 Q. And have you done any work to 12:39:49</p> <p>12 quantify when it might be able to verify a 12:39:51</p> <p>13 claim and when it might not be able to 12:39:55</p> <p>14 verify a claim? 12:39:58</p> <p>15 A. It would be difficult for me to 12:39:58</p> <p>16 do that work with the restricted data that 12:40:00</p> <p>17 Google produced. If Google had produced 12:40:08</p> <p>18 more of the data that we requested, it 12:40:09</p> <p>19 might have been possible to do more 12:40:11</p> <p>20 analysis. 12:40:12</p> <p>21 Q. When you're saying more data, 12:40:12</p> <p>22 Mr. Hochman, do you mean non-plaintiff 12:40:14</p> <p>23 class member data or are you referring to 12:40:17</p> <p>24 something else? 12:40:19</p> <p>25 A. I'm referring essentially to all 12:40:19</p> <p style="text-align: right;">Page 470</p>	<p>1 produced to you that you would have 12:41:15</p> <p>2 benefitted from and which you could have 12:41:17</p> <p>3 used to validate your analysis? 12:41:19</p> <p>4 MR. MAO: Objection, the 12:41:22</p> <p>5 document speaks for itself. 12:41:24</p> <p>6 A. I like the way I -- I said it 12:41:25</p> <p>7 before, that what I'm looking for is all 12:41:27</p> <p>8 the data that was requested that wasn't 12:41:29</p> <p>9 produced that constrained my ability to do 12:41:31</p> <p>10 analysis. 12:41:34</p> <p>11 The -- the lack of production 12:41:35</p> <p>12 hindered me, and, you know, I can't say 12:41:37</p> <p>13 for sure what I could have done with 12:41:42</p> <p>14 unknown data that I wasn't given. 12:41:44</p> <p>15 BY MR. ANSORGE:: 12:41:44</p> <p>16 Q. Yes, Mr. Hochman. My question 12:41:49</p> <p>17 was a bit different. It relates to, do 12:41:51</p> <p>18 you believe that there's some specific 12:41:55</p> <p>19 plaintiff data that you or plaintiffs have 12:41:57</p> <p>20 requested and that they have not received, 12:42:01</p> <p>21 and that if you had received it, you would 12:42:04</p> <p>22 have been able to validate your analysis? 12:42:06</p> <p>23 MR. MAO: Objection, asked and 12:42:09</p> <p>24 answered. 12:42:10</p> <p>25 A. If I said something about it in 12:42:14</p> <p style="text-align: right;">Page 472</p>
<p>1 the data that was requested that wasn't 12:40:21</p> <p>2 produced. 12:40:24</p> <p>3 Q. Are you referring to specific 12:40:25</p> <p>4 plaintiff's data that was not produced 12:40:27</p> <p>5 that -- 12:40:30</p> <p>6 A. I think -- 12:40:31</p> <p>7 MR. MAO: Objection, asked and 12:40:31</p> <p>8 answered. 12:40:32</p> <p>9 A. Yeah. As I said, what I -- what 12:40:33</p> <p>10 I said was all the data that was asked for 12:40:39</p> <p>11 that wasn't produced, so I don't want to 12:40:41</p> <p>12 be criticized for not doing some analysis 12:40:45</p> <p>13 which I couldn't do because I wasn't given 12:40:47</p> <p>14 the data to do it. That's sort of 12:40:50</p> <p>15 Catch-22. And -- 12:40:53</p> <p>16 BY MR. ANSORGE:: 12:40:54</p> <p>17 Q. Yeah. 12:40:54</p> <p>18 A. -- and I appreciate that it may 12:40:55</p> <p>19 be painful for you to hear that 12:40:57</p> <p>20 explanation, but that's the fact of it. 12:40:59</p> <p>21 Q. Mr. Hochman, I'm just trying to 12:41:03</p> <p>22 understand the bases for your opinions in 12:41:04</p> <p>23 this case. And my question was, do you 12:41:06</p> <p>24 believe that there's some specific 12:41:10</p> <p>25 plaintiffs' data that has not been 12:41:12</p> <p style="text-align: right;">Page 471</p>	<p>1 my report, then it stands. And otherwise, 12:42:15</p> <p>2 I have to answer I don't know because if I 12:42:20</p> <p>3 haven't seen some data -- if we've 12:42:23</p> <p>4 requested some data and haven't received 12:42:25</p> <p>5 it, then I can't know the utility of data 12:42:27</p> <p>6 without actually seeing it. 12:42:30</p> <p>7 Maybe there's some extra fields 12:42:32</p> <p>8 that we still haven't been given that 12:42:33</p> <p>9 would be very informative, and I don't 12:42:37</p> <p>10 know what to expect within the unknowns. 12:42:39</p> <p>11 These are literally unknown unknowns. 12:42:41</p> <p>12 BY MR. ANSORGE:: 12:42:41</p> <p>13 Q. And as you sit here before us, 12:42:46</p> <p>14 you're not aware of any particular 12:42:48</p> <p>15 plaintiffs' data that you've requested and 12:42:50</p> <p>16 have not received; is that correct? 12:42:52</p> <p>17 MR. MAO: Objection, asked and 12:42:55</p> <p>18 answered, misstates his testimony. 12:42:56</p> <p>19 A. I -- I don't have some specific 12:43:01</p> <p>20 data in mind, but I wouldn't expect that I 12:43:03</p> <p>21 would because I don't know what the 12:43:06</p> <p>22 unknown unknowns are. 12:43:08</p> <p>23 BY MR. ANSORGE:: 12:43:08</p> <p>24 Q. Mr. Hochman, do you agree that 12:43:12</p> <p>25 people living in the same household may 12:43:13</p> <p style="text-align: right;">Page 473</p>

## CONFIDENTIAL

<p>1 share computers, phones, and other 12:43:16</p> <p>2 connected devices? 12:43:18</p> <p>3 A. This is a perennial issue for 12:43:21</p> <p>4 online businesses. This is something that 12:43:25</p> <p>5 is dealt with all the time. I would point 12:43:27</p> <p>6 you to my prior answers that talk about 12:43:31</p> <p>7 this. 12:43:32</p> <p>8 I would also point you to my 12:43:33</p> <p>9 additional statement that Google in its 12:43:34</p> <p>10 fingerprinting policy considers, you know, 12:43:38</p> <p>11 [REDACTED] 12:43:41</p> <p>12 [REDACTED] 12:43:44</p> <p>13 [REDACTED] 12:43:47</p> <p>14 [REDACTED] 12:43:50</p> <p>15 So that's -- you know, Google's 12:43:51</p> <p>16 [REDACTED], 12:43:54</p> <p>17 and I don't know many households that have 12:43:55</p> <p>18 [REDACTED] people in them. 12:43:57</p> <p>19 Q. You don't think that might be a 12:44:00</p> <p>20 policy that -- to prevent identification? 12:44:02</p> <p>21 Do you believe that as a statement of 12:44:04</p> <p>22 fact, that if [REDACTED] people share an 12:44:06</p> <p>23 identifier, they're identified? 12:44:08</p> <p>24 A. I think -- 12:44:12</p> <p>25 MR. MAO: I'm sorry, objection 12:44:13</p> <p style="text-align: right;">Page 474</p>	<p>1 It's a losing issue that you're 12:45:16</p> <p>2 trying to argue. I would encourage you to 12:45:17</p> <p>3 just drop it because it's really 12:45:20</p> <p>4 frivolous. 12:45:22</p> <p>5 BY MR. ANSORGE:: 12:45:22</p> <p>6 Q. Mr. Hochman, in your report, do 12:45:24</p> <p>7 you cite any studies that analyze the 12:45:26</p> <p>8 frequency of device sharing? 12:45:27</p> <p>9 A. I'm not aware of any that I have 12:45:32</p> <p>10 cited. 12:45:34</p> <p>11 Q. And in your report, you do not 12:45:36</p> <p>12 discuss device sharing at all; isn't that 12:45:38</p> <p>13 correct? 12:45:41</p> <p>14 MR. MAO: Objection, misstates 12:45:42</p> <p>15 his testimony. The document speaks 12:45:43</p> <p>16 for itself. 12:45:46</p> <p>17 A. Yeah, whatever I said in my 12:45:47</p> <p>18 report stands. 12:45:48</p> <p>19 And I would just further add 12:45:50</p> <p>20 that I'm aware, and have always been 12:45:52</p> <p>21 aware, of the issue and the potential for 12:45:54</p> <p>22 device sharing. Same as Google is. And 12:45:56</p> <p>23 Google still gets over it when they do 12:45:59</p> <p>24 their, you know, allow log-ins, when they 12:46:02</p> <p>25 allow conversion tracking. 12:46:05</p> <p style="text-align: right;">Page 476</p>
<p>1 to the form of the question, asked and 12:44:14</p> <p>2 answered. 12:44:14</p> <p>3 A. I think it highlights the danger 12:44:15</p> <p>4 of -- of what we might call an 12:44:18</p> <p>5 identification of -- of a group. Google 12:44:24</p> <p>6 is considering under [REDACTED] to be some 12:44:27</p> <p>7 sort of small group. 12:44:29</p> <p>8 Once you narrow things down that 12:44:30</p> <p>9 much, in any sort of case where somebody 12:44:32</p> <p>10 is trying to identify a user, and I've 12:44:38</p> <p>11 said this before in prior answers, there's 12:44:40</p> <p>12 always some additional information 12:44:44</p> <p>13 available. 12:44:46</p> <p>14 There are always some 12:44:47</p> <p>15 circumstances around that, some other 12:44:47</p> <p>16 things that are known, and those can be 12:44:49</p> <p>17 used in a process of elimination to 12:44:52</p> <p>18 whittle down any small group down to 12:44:55</p> <p>19 identify the individual. 12:44:57</p> <p>20 And I know that Dave Nelson will 12:44:58</p> <p>21 come forward and offer to testify that the 12:45:01</p> <p>22 FBI does that all the time, that they're 12:45:04</p> <p>23 not hindered by this scenario of multiple 12:45:08</p> <p>24 people in a household. It's a red herring 12:45:11</p> <p>25 issue. 12:45:15</p> <p style="text-align: right;">Page 475</p>	<p>1 You know, Google, when someone 12:46:09</p> <p>2 logs in to your account, how do they know 12:46:11</p> <p>3 it's actually you and not someone else? 12:46:15</p> <p>4 They don't -- they don't worry about it 12:46:17</p> <p>5 too much. It's just -- there's so much 12:46:20</p> <p>6 that you can do. And, you know, that's 12:46:21</p> <p>7 the state of online identification. 12:46:24</p> <p>8 BY MR. ANSORGE:: 12:46:31</p> <p>9 Q. Mr. Hochman, can you point to 12:46:31</p> <p>10 any paragraphs in your report in which you 12:46:32</p> <p>11 discuss device sharing? 12:46:34</p> <p>12 A. I'm not sure that I've discussed 12:46:38</p> <p>13 device sharing, but I've talked about this 12:46:40</p> <p>14 before and given you a bunch of answers on 12:46:42</p> <p>15 this question. So I will reiterate by 12:46:44</p> <p>16 reference all those answers, and further 12:46:47</p> <p>17 add that the -- I'm aware of the potential 12:46:50</p> <p>18 for device sharing. And this is nothing 12:46:53</p> <p>19 surprising or new or that alters any of my 12:46:55</p> <p>20 opinions. 12:46:59</p> <p>21 Q. And, Mr. Hochman, two users who 12:47:01</p> <p>22 share a single device that uses the same 12:47:03</p> <p>23 Wi-Fi connection will have the same IP 12:47:08</p> <p>24 address; is that correct? 12:47:10</p> <p>25 MR. MAO: Objection, incomplete 12:47:11</p> <p style="text-align: right;">Page 477</p>



## CONFIDENTIAL

1 questions. 14:08:01	1 part later, but let me first ask you a few 14:10:20
2 BY MR. ANSORGE:: 14:08:01	2 questions about this appendice, if you 14:10:24
3 Q. Is this the appendice you were 14:08:13	3 don't mind. 14:10:28
4 referring to yesterday, Mr. Hochman? 14:08:16	4 MR. MAO: Subject to his 14:10:28
5 A. I think that I was referring to 14:08:19	5 request. So any answer you get, I may 14:10:30
6 the section in his report, which I think 14:08:21	6 move to just throw out. Up to you. 14:10:32
7 then may reference this appendix. 14:08:23	7 MR. ANSORGE: Mr. Mao, are you 14:10:33
8 Q. Have you reviewed this appendix 14:08:28	8 instructing the witness not to respond 14:10:35
9 on entropy? 14:08:29	9 to my questions? 14:10:37
10 A. Yes, I think I've looked at it. 14:08:31	10 MR. MAO: Do you want me to read 14:10:37
11 Q. And earlier when you stated that 14:08:35	11 back my answer on the record or are 14:10:38
12 you disagree with all of his opinions that 14:08:36	12 you just asking me? 14:10:40
13 relate to your work, were you thinking of 14:08:39	13 MR. ANSORGE: I'm asking you 14:10:41
14 any specific opinions that are expressed 14:08:42	14 because I believe you're aware that 14:10:42
15 in this appendix? 14:08:45	15 there's -- only very specific bases 14:10:44
16 A. When I made that comment, I'm 14:08:50	16 are appropriate for instructing a 14:10:46
17 thinking of the main opinions that are 14:08:52	17 witness not to answer a question. And 14:10:48
18 listed in his executive summary. So if 14:08:54	18 here is a document that Mr. Hochman 14:10:49
19 you were to go to the executive summary in 14:08:56	19 referred to yesterday. It's written 14:10:51
20 his report, I could show you the opinions 14:08:58	20 by an expert Mr. Hochman referred to 14:10:53
21 that I disagree with. 14:09:00	21 this morning. It is on a topic that 14:10:55
22 I'm not necessarily disagreeing 14:09:04	22 we have been discussing for the last 14:10:57
23 with his summary of math and information 14:09:06	23 two days. I believe it's appropriate 14:10:58
24 theory. I think my criticism of this is 14:09:10	24 for us to ask some questions about it. 14:11:01
25 that it's -- it's irrelevant to the issues 14:09:14	25 BY MR. ANSORGE:: 14:11:02
Page 522	Page 524
1 at hand, that it's unnecessary and that 14:09:17	1 Q. Mr. Hochman, have you reviewed 14:11:03
2 it's -- has a greater tendency to confuse 14:09:22	2 this document? 14:11:04
3 than to enlighten. 14:09:28	3 A. Actually, I think you -- you are 14:11:06
4 Q. Why do you believe -- 14:09:30	4 of a erroneous perception, which is that I 14:11:08
5 MR. MAO: He's asked for the 14:09:34	5 was referring to this document because I 14:11:13
6 document, Counsel. 14:09:35	6 was actually thinking about his expert 14:11:15
7 MR. ANSORGE: I don't think he 14:09:37	7 report, the section where he begins 14:11:17
8 has, Mr. Mao, but I'm asking questions 14:09:38	8 talking about entropy. And that section 14:11:18
9 about this now, and I'd really 14:09:39	9 is then -- I guess references this, which 14:11:22
10 appreciate if you wouldn't interrupt 14:09:41	10 provides a very thorough discussion of the 14:11:25
11 me in my line of questioning. 14:09:43	11 math. 14:11:28
12 BY MR. ANSORGE:: 14:09:43	12 And my criticism is not that 14:11:29
13 Q. Mr. Hochman, why do you believe 14:09:45	13 he's somehow gotten the math wrong. My -- 14:11:31
14 that an appendice setting out how entropy 14:09:46	14 my point, as I said yesterday, is that his 14:11:33
15 be calculated is irrelevant to this case? 14:09:52	15 analysis here is completely beside the 14:11:36
16 A. Well, okay, I'm happy to answer 14:09:55	16 point. He seems to have missed the boat 14:11:38
17 that question. I would formally request 14:09:59	17 on what I was doing in my analysis, and 14:11:40
18 the whole Psounis report because I may 14:10:01	18 he's run off into the blue with this long 14:11:43
19 want to refer to things in that report in 14:10:04	19 exposition on entropy, which is 14:11:48
20 order to explain my answer to that 14:10:07	20 unnecessary. 14:11:50
21 question. So I -- I don't have an 14:10:09	21 Q. Well, and then this might be a 14:11:52
22 intention of reading the whole report 14:10:12	22 very short module, Mr. Hochman. Is it 14:11:53
23 while you wait around. I'm not looking to 14:10:13	23 fair to say that you haven't identified 14:11:55
24 do that. 14:10:16	24 any errors in appendix E to Dr. Psounis' 14:11:57
25 Q. Yeah, maybe we can get to that 14:10:18	25 rebuttal report? 14:12:04
Page 523	Page 525



## CONFIDENTIAL

<p>1 MR. MAO: Same objection. The 14:12:05  2 witness has requested the entire 14:12:10  3 document. You're refusing to give it 14:12:12  4 to him. And secondly, misstates his 14:12:14  5 testimony. 14:12:17  6 A. I think there may be errors in 14:12:25  7 here. I'd have to go give it a thorough 14:12:27  8 read-through to point them out because I 14:12:30  9 think he makes his sort of neutral 14:12:32  10 mathematical explanation with some faulty 14:12:34  11 conclusions. So I'd have to go through it 14:12:36  12 carefully to make sure I diagnose it 14:12:38  13 properly. 14:12:40  14 And I'd also -- before I would 14:12:40  15 even do that, I would want to see the main 14:12:42  16 report so I could see what he said in the 14:12:44  17 main report before he dives into this 14:12:45  18 because that section in the main report is 14:12:50  19 context for this. 14:12:51  20 BY MR. ANSORGE:: 14:12:51  21 Q. And we'll see if we can load 14:12:54  22 that, but I'd like to ask you some 14:12:58  23 specific questions about these, not 14:13:00  24 general ones? 14:13:01  25 Do you -- 14:13:02</p> <p style="text-align: right;">Page 526</p>	<p>1 like to ask a few questions about this 14:13:40  2 appendix. 14:13:42  3 BY MR. ANSORGE:: 14:13:44  4 Q. Mr. Hochman, could you please 14:13:46  5 turn to paragraphs 43 and 44 of 14:13:47  6 Exhibit 26? And let me know once you're 14:13:52  7 there. 14:13:54  8 A. If we're going to do this, then 14:13:54  9 what I'm going to do is I'm going to start 14:13:57  10 reading this appendix. Okay? I'll try to 14:13:58  11 read it as quickly as I can. And while 14:14:01  12 I'm doing that, if you load the report, 14:14:03  13 then we're not wasting time. 14:14:05  14 And after I've had a read 14:14:08  15 through this, I'll see if I can answer 14:14:09  16 your questions, okay? I at least have to 14:14:12  17 go skim the whole thing to see what's in 14:14:15  18 here to refresh my memory. 14:14:17  19 Q. Please do. I believe the report 14:14:18  20 is loaded as well, but please skim this 14:14:20  21 Exhibit 26. 14:14:22  22 A. Okay. Let me just have a look. 14:14:24  23 If the report's loaded, I might start 14:14:26  24 there. 14:14:28  25 Okay. Great. The report is 14:14:30</p> <p style="text-align: right;">Page 528</p>
<p>1 MR. MAO: Same objections. 14:13:02  2 MR. ANSORGE: Understood. We're 14:13:03  3 going to see if we can get the report 14:13:04  4 with, I believe, Mr. Hochman's 14:13:08  5 assurance that he would not read each 14:13:09  6 line because I want us to be able to 14:13:13  7 move more quickly than we did this 14:13:13  8 morning, Mr. Hochman. 14:13:13  9 (Crosstalk.) 14:13:13  10 MR. MAO: Go ahead. 14:13:13  11 A. Mr. Ansorge, I actually enjoy 14:13:19  12 talking to you about the substance of this 14:13:20  13 case. I'm excited to continue talking to 14:13:22  14 you about substantive issues. I'm not 14:13:24  15 looking to waste your time. 14:13:25  16 MR. ANSORGE: Excellent. Could 14:13:25  17 you please -- 14:13:27  18 MR. MAO: At the same time -- 14:13:27  19 stop. Stop. Stop. At the same time, 14:13:29  20 he is entitled to do what he needs to 14:13:30  21 do in order to read your -- in order 14:13:32  22 to be able to answer your question. 14:13:33  23 Okay? 14:13:34  24 MR. ANSORGE: And we're seeing 14:13:37  25 if we can load the report, but I would 14:13:38</p> <p style="text-align: right;">Page 527</p>	<p>1 loaded. 14:14:32  2 BY MR. ANSORGE:: 14:14:43  3 Q. And my questions, Mr. Hochman, 14:14:43  4 are about appendix E of the report -- 14:14:44  5 A. Why don't you -- why don't -- 14:14:44  6 Q. -- that is loaded as Exhibit 26. 14:14:55  7 (Reporter clarification.) 14:14:59  8 MR. MAO: Mr. Hochman, if you 14:14:59  9 need to read what you need to read to 14:15:00  10 answer the question, please do so. 14:15:02  11 A. I will take time to read, 14:15:05  12 Mr. Ansorge, but first, why don't you ask 14:15:06  13 the question because then I'll know what 14:15:09  14 I'm looking for, and that's more 14:15:12  15 efficient -- that way, I can skip over 14:15:13  16 sections that aren't relevant. 14:15:16  17 BY MR. ANSORGE:: 14:15:18  18 Q. Have you read paragraphs 43 and 14:15:18  19 44 of Exhibit 26? 14:15:22  20 A. Not recently. I would want to 14:15:23  21 read them and the paragraphs around them 14:15:25  22 to refresh my memory, and I'd actually 14:15:26  23 want to skim the whole thing too. 14:15:28  24 Q. Please do. 14:15:30  25 A. Okay. I'm just going to open 14:15:31</p> <p style="text-align: right;">Page 529</p>

## CONFIDENTIAL

1 the door to my office so I can get a 14:15:40	1 statement by Dr. Psounis? 14:24:35
2 little more air conditioning in here. I'm 14:15:42	2 A. No. He's suffering from 14:24:37
3 not leaving. Just one second. 14:15:44	3 professoritis, which is he's thinking too 14:24:39
4 I don't have a vent in this 14:15:51	4 hard about things in theory and not taking 14:24:42
5 room. Okay. Okay. So if you'd like to 14:15:53	5 in enough real-world experience. 14:24:45
6 start with appendix E, we could. It might 14:17:28	6 Q. And how would real-world 14:24:49
7 be more productive to start with the 14:17:31	7 experience change his statement in 14:24:52
8 sections of the report, section E of the 14:17:34	8 paragraph 12? 14:24:54
9 report, but I'll do it whichever way you 14:17:37	9 A. Knowing that users are routinely 14:24:56
10 want because it's your deposition. 14:17:40	10 identified by IP address and user agent, 14:24:59
11 Q. Thanks, Mr. Hochman. I would 14:17:42	11 that this is commonly used to identify 14:25:03
12 like to start with appendix E. 14:17:43	12 people, and that anyone in the security 14:25:05
13 A. All right. So I need to go and 14:17:45	13 field who has real-world experience would 14:25:09
14 skim over it. Give me a little bit of 14:17:47	14 recognize that this is a noncontroversial 14:25:12
15 time to do that. 14:17:49	15 assertion, and that he has somehow gone 14:25:14
16 Q. Would it help if I ask a 14:21:26	16 about using a lot of math and sophistry to 14:25:17
17 question, Mr. Hochman, to focus 14:21:28	17 reach an incorrect result, because he's, I 14:25:21
18 discussion? 14:21:30	18 think, asserting the possibility or 14:25:25
19 A. You know, I'm -- actually, my 14:21:31	19 existence of conditions that don't match 14:25:27
20 review is proceeding very quickly because 14:21:32	20 real-world conditions. 14:25:32
21 most of the stuff -- 14:21:34	21 Q. Can you please turn to the last 14:25:33
22 Q. Sorry for interrupting. 14:21:36	22 page of Exhibit 26? And this will be 14:25:36
23 A. Sure. Basically, this stuff is 14:21:38	23 below paragraph 44, and there should be a 14:25:39
24 all just basic course work or basic 14:21:40	24 graph there. Let me know if you see it. 14:25:42
25 lecture, so I'm familiar with it. So I'm 14:21:44	25 MR. MAO: Objection. You led 14:25:44
Page 530	Page 532
1 just zooming through it. So I'm already 14:21:46	1 the witness to believe that you were 14:25:47
2 up to paragraph 29 in my review. Just 14:21:48	2 only going to ask him about questions 14:25:48
3 give me a couple more minutes. I'll get 14:21:50	3 in which he read up to, okay? And now 14:25:51
4 right through the paragraphs you want, and 14:21:52	4 you're proceeding to move past that. 14:25:52
5 then I'll be able to answer questions 14:21:54	5 MR. ANSORGE: I thought -- 14:25:52
6 without further delay. 14:21:57	6 (Reporter clarification.) 14:25:52
7 Okay. I'm now to paragraph 43. 14:23:50	7 MR. MAO: I already made my 14:26:00
8 And why don't you give me your question, 14:23:53	8 objections on that. Please allow him 14:26:01
9 and I'm going to read this paragraph 14:23:55	9 to finish the document if you're going 14:26:02
10 closely and answer your question, okay? 14:23:57	10 to proceed beyond what you represented 14:26:04
11 Q. Because you've read everything 14:23:59	11 to him, please. 14:26:06
12 leading up to it, let me set it up this 14:24:01	12 A. Yeah, just a second. I'll just 14:26:09
13 way. In paragraph 12, Dr. Psounis states 14:24:05	13 need to do a little further reading and 14:26:11
14 that "If there is no reliable mapping 14:24:08	14 I'll get to that. Just give me a minute. 14:26:14
15 relating an identifier value to a device 14:24:12	15 BY MR. ANSORGE:: 14:26:16
16 because," for instance "an identifier 14:24:16	16 Q. Mr. Hochman, I apologize, but 14:26:17
17 value may correspond to multiple devices, 14:24:18	17 hadn't you said that you had reviewed the 14:26:18
18 then, regardless of the entropy bits of 14:24:21	18 document? Sorry if I rushed you. 14:26:20
19 the identifier, we cannot reliably 14:24:23	19 A. No, no, I just wanted your 14:26:24
20 identify a device." 14:24:27	20 question, but then I am going to -- why 14:26:26
21 Do you see that? 14:24:28	21 don't you go ahead and ask your question, 14:26:27
22 A. Yes. 14:24:28	22 and then I'm going to read 43 onward as 14:26:28
23 Q. Did I read that correctly? 14:24:29	23 far as I need to in order to answer your 14:26:32
24 A. Yes. 14:24:32	24 question, okay? 14:26:34
25 Q. And do you agree with this 14:24:33	25 Q. Yeah. So my question is going 14:26:35
Page 531	Page 533

## CONFIDENTIAL

<p>1 4:16 p.m. Thank you. 16:16:51</p> <p>2 MR. MAO: Can I get an expedited 16:16:55</p> <p>3 copy? 16:16:57</p> <p>4 THE COURT REPORTER: And a 16:17:06</p> <p>5 rough? 16:17:06</p> <p>6 MR. MAO: Yes, please. 16:17:06</p> <p>7 (Time noted: 4:16 p.m.)</p> <p>8</p> <p>9 _____</p> <p>10 JONATHAN HOCHMAN</p> <p>11</p> <p>12 _____</p> <p>12 Subscribed and sworn to</p> <p>13 before me this _____</p> <p>13 day of _____ 2022.</p> <p>14 _____</p> <p>14 Notary Public</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 614</p>	<p>1 JONATHAN HOCHMAN</p> <p>2 jonathan@hochmanconsultants.com</p> <p>3 July 26, 2022</p> <p>4 RE: BROWN VS GOOGLE LLC</p> <p>5 JULY 21, 2022, JONATHAN HOCHMAN, VOLUME II, JOB NO 5312353</p> <p>6 The above-referenced transcript has been</p> <p>7 completed by Veritext Legal Solutions and</p> <p>8 review of the transcript is being handled as follows:</p> <p>9 ___ Per CA State Code (CCP 2025 520 (a)-(e)) – Contact Veritext</p> <p>10 to schedule a time to review the original transcript at</p> <p>11 a Veritext office</p> <p>12 ___ Per CA State Code (CCP 2025 520 (a)-(e)) – Locked PDF</p> <p>13 Transcript - The witness should review the transcript and</p> <p>14 make any necessary corrections on the errata pages included</p> <p>15 below, notating the page and line number of the corrections</p> <p>16 The witness should then sign and date the errata and penalty</p> <p>17 of perjury pages and return the completed pages to all</p> <p>18 appearing counsel within the period of time determined at</p> <p>19 the deposition or provided by the Code of Civil Procedure</p> <p>20 ___ Waiving the CA Code of Civil Procedure per Stipulation of</p> <p>21 Counsel - Original transcript to be released for signature</p> <p>22 as determined at the deposition</p> <p>23 ___ Signature Waived – Reading &amp; Signature was waived at the</p> <p>24 time of the deposition</p> <p>25</p> <p style="text-align: right;">Page 616</p>
<p>1 CERTIFICATION</p> <p>2</p> <p>3 I, BELLE VIVIENNE, a Nationally</p> <p>4 Certified Realtime Reporter, do hereby</p> <p>5 certify:</p> <p>6 That the witness whose testimony as</p> <p>7 herein set forth, was duly sworn by me;</p> <p>8 and that the within transcript is a true</p> <p>9 record of the testimony given by said</p> <p>10 witness.</p> <p>11 I further certify that I am not</p> <p>12 related to any of the parties to this</p> <p>13 action by blood or marriage, and that I am</p> <p>14 in no way interested in the outcome of</p> <p>15 this matter.</p> <p>16 IN WITNESS WHEREOF, I have hereunto</p> <p>17 set my hand this 26th day of July 2022.</p> <p>18</p> <p>19 <i>Belle Vivienne</i></p> <p>20 BELLE VIVIENNE, CKR, CCR, RPR</p> <p>21</p> <p>22 * * *</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 615</p>	<p>1 ___X_Federal R&amp;S Requested (FRCP 30(e)(1)(B)) – Locked .PDF</p> <p>2 Transcript - The witness should review the transcript and</p> <p>3 make any necessary corrections on the errata pages included</p> <p>4 below, notating the page and line number of the corrections.</p> <p>5 The witness should then sign and date the errata and penalty</p> <p>6 of perjury pages and return the completed pages to all</p> <p>7 appearing counsel within the period of time determined at</p> <p>8 the deposition or provided by the Federal Rules.</p> <p>9 ___ Federal R&amp;S Not Requested - Reading &amp; Signature was not</p> <p>10 requested before the completion of the deposition.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 617</p>